

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 10-CR-20123

v.

HONORABLE VICTORIA A. ROBERTS

DAVID BRIAN STONE, JR., et al.,

Defendants.

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NOTICE OF FORFEITURE BILL OF PARTICULARS

NOW COMES the United States of America, by and through BARBARA L. MCQUADE, United States Attorney and JULIE A. BECK, Assistant United States Attorney, and submits this Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to clarify the criminal forfeiture allegations included in the Second Superseding Indictment and to specify assets subject to criminal forfeiture.

This Notice of Bill of Particulars incorporates by reference, in its entirety, the Second Superseding Indictment, specifically the Criminal Forfeiture Allegations which set forth the statutory basis for the forfeiture of assets for each substantive count.

Accordingly, pursuant to 18 U.S.C. § 981(a)(1)(G), 924(d); 26 U.S.C. § 5872; 28 U.S.C. § 2461(c); and 49 U.S.C. § 80303, the government seeks to forfeit all assets involved in the offenses charged in Counts 2-15 of the Second Superseding Indictment. The assets sought for forfeiture include, but are not limited to:

A) **68 Assorted Firearms**, including:

- 1) One .44 cal Winchester rifle, Model 94AE w/ bag, Serial Number: 6188623;
- 2) One Springfield Armory rifle, w/bag, Serial Number: 1792960;
- 3) One State Arms Co. rifle, Model SE115, w/bag, Serial Number: 121297
- 4) One Maadi Co., MISR 7.62 x 39mm semi-auto rifle, w/bag, Serial Number: CM12801;
- 5) One Russian bolt action rifle, Model 1938, 7.62x54, Serial Number: M3804134;
- 6) One .223 cal Hesse, Model 47 rifle, w/bag, Serial Number: K005582;
- 7) One Springfield US Rifle MIA, w/strap, bag, and scope, Serial Number: 085102;
- 8) One Rom Arm, Model CN 7.62 x .32mm, w/bag, Serial Number: S1-65705-2002;
- 9) One .50 cal State Arms rifle, w/bag, Serial Number: MQM15;
- 10) One Mossberg 22 LR, w/bag, Serial Number: 115786;
- 11) One 12 gauge Winchester shotgun, Model 1300, w/bag, Serial Number: L2265905;
- 12) One .308 cal Century Arms R1A1 Sporter rifle, Serial Number: NC001632;
- 13) One .308 cal Remington rifle, Model 700, Serial Number: G6236814;
- 14) One .308 cal Century Arms R1A1 Sporter rifle, w/bag and magazine, Serial Number: 01-02926;
- 15) One GEVARSFAKTORI 1916, w/bag, Serial Number: HK 400808;
- 16) One 7.52 x 54 cal Bolt action rifle, w/bag, Serial Number: 16567M44;
- 17) One 12 gauge Remington shotgun, Model 870, Serial Number: B901921M;
- 18) One 7.62 x 39mm CN Rom Arm rifle, w/bag, Serial Number: S1-63234-2002;

- 19) One 12 gauge Beretta shotgun, Model 1201 FP, Serial Number: A13802L;
- 20) One 7.62 x 39mm GP WASR rifle, w/bag, Serial Number: SBN-3391-86R0;
- 21) One Smith & Wesson handgun, Model 66-4, Serial Number: CAA4220;
- 22) One Colt 22 w/case and 2 magazines, Serial Number: PH10235;
- 23) One Sigsauer handgun, Model P229, w/box and two magazines, Serial Number: AD14714;
- 24) One Sigsauer, Model P228, w/two magazines, Serial Number: B216729;
- 25) One Sigsauer, Model P228 9mm, w/two magazines, Serial Number: B138129;
- 26) One Beretta, 9mm, w/two magazines in box, Serial Number: L62696Z;
- 27) One 9mm Beretta, Model 92FS, w/magazine, Serial Number: L65909Z;
- 28) One Smith & Wesson, .38 special, Model 60, Serial Number: BRU3765;
- 29) One Colt Series 80, Model M1991A1, w/box and one magazine, Serial Number: 2741457;
- 30) One .32 cal Derringer pistol, Davis Industries, Model D/32, Serial Number: 502509;
- 31) One .32 cal Beretta, 3032 Tom Cat, Serial Number: DAA262517;
- 32) One .380 cal/9mm Kurz pistol, Serial Number: DA28955;
- 33) One .22 cal Ruger long rifle, w/case, Serial Number: 22588473;
- 34) One .22 LR Ruger, Model 10/22 carbine rifle, w/bag, Serial Number: 238-68765;
- 35) One .22 cal Mossberg & Sons LR semi-auto, w/scope and bag, Serial Number: 151M6;
- 36) One 12 gauge Remington shotgun, Model 870, Serial Number: T734864V;

- 37) One AK47 rifle, Model BWJ-92 Sporter, w/strap and case, Serial Number:
303217;
- 38) One 7.62 cal Maadi Co. rifle with bag, strap and case, (no Serial Number);
- 39) One AK47 rifle with collapse stock, strap and bag, Serial Number: CM18149;
- 40) One 12 gauge Beretta shotgun with box, Model 1201FP, Serial Number:
A167661;
- 41) One .22 cal handgun, Model NRA, w/two magazines and box, Serial Number:
20141;
- 42) One Savage 22 short long or long rifle, Model 63 with scope, (no Serial Number);
- 43) One BFI rifle, Model XM15-E2S. 22/3-5.56mm, w/strap and box, Serial Number:
L045594;
- 44) One 5.56mm XM-15 E2, Sendra Corp rifle, Serial Number: 02767;
- 45) One GEVARSAFAKTORI 1922, Serial Number: HK 498757;
- 46) One Barrett Demon Crossbow, Model PC-638, (no Serial Number);
- 47) One AK-47 Bayonet, (no Serial Number);
- 48) One Bolt action rifle with bolt detached, stamped with 16 Petal Chrysanthemum
Symbol, Serial Number: 33380;
- 49) One US Rifle MCA-Springfield Armory, Serial Number: 149420;
- 50) One 12 gauge Mossberg shotgun, w/BSA Deerhunter scope, Serial Number:
P944619;
- 51) One 7.62 x 39mm WASR 10 rifle, Serial Number: 1-30625-2002;
- 52) One Bushmaster .223 rifle, Model XM15-E2S, Serial Number: L453422;

- 53) One Springfield 22 rifle, Model 187S, Serial Number: A200743;
- 54) One muzzle loader rifle, (no Serial Number);
- 55) One Marlin 30/30 Model 336CS, Serial Number: 15009303;
- 56) One 12 gauge Eastern Arms double barrel shotgun, Serial Number: T49693;
- 57) One Hesse 7.62mm rifle, Serial Number: 008476;
- 58) One 1954 rifle, Serial Number: RF1463;
- 59) One .22 cal Romania rifle, Serial Number: M6903563;
- 60) One Bolt rifle with magazine and plastic piece set, Serial Number: W0626;
- 61) One 12 gauge Savage Arms pump shotgun, Model 6670H, (no Serial Number);
- 62) One flare gun 1985II with case and flares, Serial Number: LR3443;
- 63) One Sturm Ruger P94 handgun with magazine, Serial Number: 34162452;
- 64) One Antique muzzle loader rifle, Serial Number: 985597;
- 65) One .50 caliber antique muzzle loader, Serial Number: 87503628;
- 66) One 20 gauge Ithaca shotgun, M-66 Super Single, Serial Number: 660973024;
- 67) One 20 gauge Mossberg rifle, Serial Number: R049855;
- 68) One DPMS 223-5.56mm Panther Arms rifle, Model A-15 with strap and magazine, Serial Number: F039519K;

B. Assorted Ammunition, including:

- 1) 10.09 pounds of ammunition, including .50, and 7.62 caliber;
- 2) 1.53 pounds of 12 gauge shotgun shells;
- 3) 27.15 pounds of miscellaneous ammunition including one round of 7.62 ammunition;

- 4) 80 rounds of .22 cal long rifle ammunition;
- 5) 200 rounds of .380 cal;
- 6) 160 rounds of 30/30 cal;
- 7) 79 rounds of 12 gauge buck shotgun;
- 8) 33 rounds of 12 gauge slug shotgun;
- 9) 22.54 pounds of ammunition, 7.62 rifle caliber;
- 10) 39.87 pounds of ammunition, including .22, .22 long rifle, 9mm, .308, .30 rifle, shotgun shells;
- 11) 98.4 pounds of ammunition, including .45 caliber, .223 and shotgun shells;
- 12) 2.85 pounds of ammunition, including .308, .22, .22 long rifle, shotgun shells;
- 13) 73.45 pounds of ammunition, .308 rifle caliber;
- 14) 32.63 pounds of ammunition, 5.56 rifle caliber;
- 15) 23.42 pounds of ammunition, 12 gauge shotgun shells;
- 16) 27.59 pounds of ammunition, .30 caliber;
- 17) 78.88 pounds of ammunition, .308 rifle caliber;
- 18) 36.03 pounds of ammunition, 7.62 rifle caliber;
- 19) 32.87 pounds of ammunition, .223 rifle caliber;
- 20) 14.34 pounds of ammunition, 7.62 rifle caliber;
- 21) 10.52 pounds of ammunition, 7.62 rifle caliber;
- 22) 30.01 rounds of ammunition, 7.62 rifle caliber;
- 23) 18.12 pounds of ammunition, .308 and 7.62 rifle caliber;
- 24) 23.97 pounds of ammunition, 7.62 caliber;

- 25) 15.42 pounds of ammunition, .223 caliber;
- 26) 21.93 pounds of ammunition, .38 caliber;
- 27) 11.74 pounds of ammunition, .38 caliber;
- 28) 29.53 pounds of ammunition, 12 gauge buckshot and 12 gauge slug shotgun rounds;
- 29) 27.44 pounds of ammunition, .38 caliber;
- 30) 26.71 pounds of ammunition, .223 caliber;
- 31) 15.40 pounds of ammunition, including .22 long rifle, .308, .223, .38, and shotgun shells;
- 32) 21.57 pounds of ammunition, 7.62 rifle caliber;
- 33) 10.09 pounds of ammunition, including .380, .22 long rifle, .223, 12 gauge shotgun shells, .50, 7.62 caliber;
- 34) 50 round 7.62mm drum magazine; two 30 round of .223 magazines; three 20 round of .223 magazines;
- 35) .32 magazine; one .380 magazine; one .22 magazine;
- 36) 90 round .5.56mm drum magazine;
- 37) 75 round of 5.56mm drum magazine;
- 38) 20 7.62 magazines; one 100 round of 5.56mm dbl-drum magazine; one 10 round .22 magazine;
- 39) 30 .22 magazines; 2-30, 7.62 magazines; 1-20 5.56 magazine; 3-20 7.62 magazines; 3-30 round .223 magazines; 2-10 round .223 magazines;
- 40) Ten round .45 magazine; two 20 round .223 magazines; three 30 round .223

magazines;

- 41) 7.32 magazine; 1-10 9mm magazine; 1-10 .22 magazine; 1-30 .223 magazine; 4-20 .223 magazine; 1-30 10mm magazine; 1-20 round .22 magazine;
- 42) 40 round 7.62 magazine; 5-30 round 7.62 magazines; three 20 round 7.62 magazines; two 90 round 5.56 magazines;
- 43) 90 round ammunition drum for .223 ammunition;
- 44) Miscellaneous ammunition, including approximately 1,688.59 pounds and 64,603 rounds of ammunition, including 9mm, .22, .22 short and long, .223, .308, 30-06, .357, .38, .380, .40, .44, .45, 5.56, 6.5 x 55, 7.62, 7.62 x 51, 9 x 19, 12 gauge .50 and .50 primers;
- 45) Miscellaneous gun magazines, including: four, 10 round 7.62; twelve, 20 round 7.62; four, 10 round .45; sixteen, 30 round .223; three, 10 round .380; one, 90 round .223; four, 20 round .223.

C. **Assorted Explosives**, including:

- 1) One box labeled ten 26.5 Sig-MD (12/83)(Soviet Flares);
- 2) 17.70 pound metal ammunition box with 11 signal flares;
- 3) One metal canister with 20 flares; four bottles grenade smoke; bag of white granules;
- 4) Two Tannerite containers; aluminum container; jar of unknown white powder labeled Puhdistusaine;
- 5) 43.21 pound metal canister with 25 flares;
- 6) 45.57 pound metal canister with 28 flares and tin can with baggy grey powder;

- 7) 31.24 metal ammunition box with fireworks (30 shells for tubes);
- 8) 38 signal flares;
- 9) Ten 26.5 Sig-osp (Soviet) flares;
- 10) Two parachute flares; and
- 11) One can of Federal Streamer No. 280 Liquid Teargas.

D. Assorted Vision and Scope Equipment, including:

- 1) One pair of Bushnell binoculars;
- 2) One BEC, Inc., Gold label scope, BEC # AR39X42WA;
- 3) One Leupold M8-2X scope;
- 4) Five (5) BSA air rifle 7x32AQ scopes;
- 5) One Simmons 4 x 32 scope;
- 6) One Busnell Banner II 3x9 scope;
- 7) One Butler-Creek, model WTC89D scope;
- 8) One Tasco 3-9x32 scope;
- 9) One generic rifle scope, Serial Number 000274;
- 10) Three (3) generic rifle scopes;
- 11) Nine (9) scope covers;
- 12) One generic rifle scope with mount, Serial Number 07120100;
- 13) One Hensoldt-Wetzlar gun scope with case, Serial Number 1240-12-179-7120
with case;
- 14) One AMT Viper vision scope;
- 15) One NC Star 40x30 handgun scope;

- 16) One Tasco scope 6-24x40, Serial Number AT-997; and
- 17) One Knife Jungner A-40-0, Model 6187 periscope, Serial Number M3211-000411 with case.

E. **Other Assorted Items**, including:

- 1) One Point Blank body armor, Serial Number: HC93022977;
- 2) One Yukon Advanced Optics night vision binoculars, Model 28041, with case, Serial Number: 30353118.

Respectfully submitted,

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